

UNITED STATES OF AMERICA

v.

GINA GUY and
ROSANNA LISA STANLEY,

Defendants.

24 Mag. 2386

Diarra M. Guthrie, pursuant to Title 28, United States Code, Section 1746, hereby declares
under penalty of perjury:

2. The defendants were charged in a complaint dated June 24, 2024, with violations of 18 U.S.C. §§ 1343, 1349, 1956, and 2, and were arrested and presented on June 25, 2024. Defendant Gina Guy was presented in this District before Magistrate Judge Robyn F. Tarnofsky, at which proceeding defendant Guy was represented by Marisa Cabrera, Esq., and ordered released on bail with certain conditions. Defendant Rosanna Lisa Stanley was presented in the Southern District of Florida before Magistrate Judge Lisette M. Reid, at which proceeding defendant Stanley was represented by Frank Quintero Jr., Esq., and ordered released on bail with certain conditions.

3. At defendant Guy's presentment in this District, a preliminary hearing was scheduled for July 25, 2024, after defense counsel for defendant Guy consented to extend the deadline within which to conduct a preliminary hearing. Under the Speedy Trial Act, the Government had until July 25, 2024 to file an indictment or information. *See* 18 U.S.C. § 3161(b).

4. At defendant Stanley's presentment in the Southern District of Florida, neither a preliminary hearing nor a control date was scheduled. Under the Speedy Trial Act, the Government had until July 25, 2024 to file an indictment or information.

5. On July 12, 2024, Magistrate Judge Sarah Netburn entered an Order of Continuance, pursuant to Rule 5.1(d) and 18 U.S.C. § 3161(h)(7)(A), extending the time within which a preliminary hearing would have to be conducted or an indictment or information would have to be filed in this case until August 24, 2024.

6. On August 22, 2024, Magistrate Judge Ona T. Wang entered an Order of Continuance, pursuant to Rule 5.1(d) and 18 U.S.C. § 3161(h)(7)(A), extending the time within which a preliminary hearing would have to be conducted or an indictment or information would have to be filed in this case until September 23, 2024.

7. On September 19, 2024, Magistrate Judge Robyn F. Tarnofsky entered an Order of Continuance, pursuant to Rule 5.1(d) and 18 U.S.C. § 3161(h)(7)(A), extending the time within which a preliminary hearing would have to be conducted or an indictment or information would have to be filed in this case until October 23, 2024.

8. On October 22, 2024, Magistrate Judge Gary Stein entered an Order of Continuance, pursuant to Rule 5.1(d) and 18 U.S.C. § 3161(h)(7)(A), extending the time within

which a preliminary hearing would have to be conducted or an indictment or information would have to be filed in this case until November 22, 2024.

9. Defendant Guy is represented by William Castro, Esq.

10. Defendant Stanley is represented by Joseph Corozzo, Esq.

11. I have had discussions regarding a possible disposition of this case with both Mr. Castro and Mr. Corozzo. The parties plan to continue our discussions, but do not anticipate a resolution before November 22, 2024.

12. Therefore, the Government requests a 30-day continuance until December 23, 2024, to continue the foregoing discussions toward resolving this matter. On November 20, 2024, I personally corresponded with defense counsel for defendants Guy and Stanley, respectively, who indicated that they consent to an extension of the preliminary hearing and Speedy Trial Act deadlines to December 23, 2024, and have specifically consented to this request. This application has been authorized by Assistant United States Attorney Andrew Dember, Deputy Chief of the Criminal Division.

13. For the reasons stated above, good cause supports the extension of the preliminary hearing deadline, and the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and defendant in a speedy trial.

Dated: New York, New York
November 21, 2024



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